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Attn: Brian Price
 United States Department of Transportation
 Federal Highway Administration
 HS-30 Room 3400
 400 7th St. SW
 Washington, DC 20590

Subject: Sleeper berths on busses, Section 393.76 h

This section addresses sleeper berths on busses, but does not definitely define the requirements except to say that the berth must meet the size requirements for truck use, Section 393.76 Item 3, sleeper berths in cargo area of a motor vehicle shall be completely compartmentized from the remainder of the cargo space.

There is one place on busses that meets all the requirements of 393.76(3) and that is one of the luggage compartments. This area can be converted to a sleeper berth by making both doors on each side operational from the inside of compartment, intercom communication with driver area and heat and cooling is very easily added to this area meeting the requirements for air to this area. The baggage compartment on busses meets all requirements for a sleeper berth as it is constructed to carry heavy loads. Floors are strongly constructed. The vertical bulkheads well withstand 6,000 lbs. forward restraining requirements. This area could be utilized with the addition of the required items (door operational from inside, air conditioning, communication and required mattress), With these things done, the compartment could be changed very easily from sleeper berth to baggage at will or the area could have additional bulkhead added and meet all the requirements of sleeper berth dimensions and only use one-half of one compartment and the other half could still be used for luggage.

Section 393.76 Item (6) covers Section 393.76 (h) but all interpretation of this Section 393.76 in the field and on request from Washington, D.C. is that this applies before Jan. 1, 1953.
 (Letter Enclosed)

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Also, the requirement for access from the sleeper berth to the driver's area is not required in this Section 393.76.

I have been in the bus transportation business for 44 years and spotting drivers to meet the hours of service has always been expensive and the hardest part of long charters as 30%-40% of charters in the west are from 750-1,000 miles one way. This requires two drivers. Also, when the bus arrives at destination, the charter party sometimes need the driver all day before the drivers are relieved. With sleeper berths, we can meet all hour requirements and never have an overtired driver in this situation. I have 3 busses that meet all the requirements of 393.76, but I had to make an 18" X 36" opening in the floor to meet the sleeper berth to driver area requirement. I feel that with Section 393.76-6, it should be approved without door to drivers area being necessary. Bus drivers that have been in the driver's seat for 10 hours with short rest stops are not the safest drivers on the road. Truck drivers can stop anytime they feel sleepy or need a short nap, but bus drivers cannot do this. Also, at one bus convention, the insurance presentation said that 28% of all bus accidents were rear-end collisions which seems to indicate to me that they get complacent after so many hours of driving. On a recent trip to Mexico, I saw several buses with sleeper berths. At least half of the buses I saw had sleeper berths built in this baggage bay area and they are used all of the time. They did not have entrance into the driver's area.

SUN VALLEY STAGE, INC.



Garth J. Kirkman
President

Enclosure (3)